

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Pamela Heard-Johnson)	Chapter 13 Proceeding
Debtor)	Case No. 14-16608
)	Judge Price Smith

MOTION TO INCUR DEBT AND PURCHASE A VEHICLE

Now comes Pamela Heard-Johnson, debtor herein, by and through counsel, and hereby moves this Honorable Court for permission to purchase a vehicle. Debtor submits that her vehicle is in poor condition and in need of significant repairs. She is employed and must have a vehicle. Debtor cannot rely on her present vehicle and cannot risk having no transportation, especially with winter approaching.

Debtor has the opportunity to purchase a reliable 2018 Ford Escape through Ganley Lincoln of Middleburg Heights. The terms of the proposed deal are as follows: 72 months at 14.95% interest with a monthly payment of \$506.34. (See Exhibit A attached hereto). Debtor is a single woman and the payment includes an extended warranty, which will provide her with peace of mind.

A car is a necessary expense and debtor has adjusted her monthly expenses so that the car payment will not jeopardize the completion of her Chapter 13 Plan in on or about eight (8) months. Alternatively, a broken down vehicle would impact debtor's ability to work and jeopardize her ability to fund the plan and complete it in a timely fashion.

WHEREFORE, debtor requests that this Court issue an Order Order permitting debtor to incur additional debt and purchase a vehicle.

Respectfully submitted,

/s/ Renée Heller

Renée Heller (0062894)

Attorney for Debtor

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Cleveland, OH 44118

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CERTIFICATE OF SERVICE

A copy of the foregoing Motion was served on October 18, 2018 via regular U.S. Mail or electronically to:

Lauren Helbling, Chapter 13 Trustee
ch13trustee@ch13cleve.com

Pamela Heard-Johnson, debtor, 103 Greenbriar Court Cleveland, OH 44143

Ganley Lincoln of Middleburg Heights, 6930 Pearl Road, Middleburg Hts., OH 44130

/s/ Renee Heller

Renee Heller
Attorney for Debtor